Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	**WC Docket No. 18-60**
Iowa Network Access Division Tariff F.C.C. No. 1	**Transmittal No. 36**

REPLY IN SUPPORT OF AT&T SERVICES, INC.'S
MOTION TO AMEND PROTECTIVE ORDER

Pursuant to 47 C.F.R. § 1.45(c), AT&T Services, Inc. ("AT&T") respectfully submits this Reply in support of its Motion to Amend the Commission's March 26, 2018 Protective Order ("*Protective Order*"), and in response to the Opposition filed on April 30, 2018 by Iowa Network Services, Inc. d/b/a Aureon Network Services ("Aureon").

The issue presented here is a narrow one, and is simple to resolve. In the complaint proceeding, Aureon had no objection to allowing AT&T's cost analyst, Daniel P. Rhinehart, to have access to both Confidential and Highly Confidential information, including certain third party data. The Commission in that proceeding relied on that data and Mr. Rhinehart's testimony to determine that substantial questions exist as to the reasonableness of Aureon's rates. Similarly, in suspending Aureon's tariff and opening this investigation, the Commission concluded that significant questions existed as to Aureon's revised rate, again relying, in part, on a declaration submitted by Mr. Rhinehart. Now, Aureon—in an apparent effort to hinder AT&T and Mr. Rhinehart from providing further damaging testimony about Aureon's rates and rate manipulation—seeks to exclude Mr. Rhinehart from accessing certain updated information in this proceeding. In short, Aureon is seeking to use the Protective Order improperly as a sword to gain

a strategic advantage, and not solely as a shield to keep legitimately sensitive information from the public and/or competitive decision-makers.[1]

The Commission should not permit this blatant gamesmanship. Unlike the *Charter* case,[2] this case does not involve a situation in which the Commission would be embracing "an essentially content-free standard that will allow it to expose a company's most commercially sensitive information to the public whenever it feels like it." *See* Pai Stmt., 30 FCC Rcd. at 10401. Further, nothing in AT&T's motion has any effect on the Commission's authority to adopt, in a different proceeding involving a large number of participants, a protective order with more stringent protections on the dissemination of confidential information. As to the information in dispute here, Mr. Rhinehart has long had access to the very same type of information, and AT&T has plainly made a "persuasive showing as to the reason for inspection" by Mr. Rhinehart.[3] As shown below, none of Aureon's arguments have merit, and if the Commission wants to ensure a complete record, then AT&T's Motion should be granted.

First, Aureon is now taking a position wholly inconsistent with the position it took in the formal complaint proceeding, which involved the same type of data the Commission has requested in connection with this tariff investigation. In the complaint proceeding, Aureon was insistent that its business executives be given access to AT&T's highly confidential information. It claimed that

[1] Aureon has now agreed to permit Mr. Rhinehart and three other individuals designated by AT&T in the complaint proceeding to use "Confidential" and "Highly Confidential" information from the complaint proceeding in this investigation, *see* Opp. at 2 & 13, and while this compromise position is helpful, it does not resolve the issue raised by this motion because the focus of this investigation is Aureon's *current* tariff filing. For AT&T to provide a complete presentation to the Commission on this issue, Mr. Rhinehart needs access to all "Confidential" information that Aureon is relying on to support its current CEA rate.

[2] *Applications of Charter Commc'ns et al.*, 30 FCC Rcd. 10360 (2015) ("*Charter*").

[3] *Id.*, 30 FCC Rcd. at 10399. Likewise, because the Commission has in this case and in the complaint proceeding favorably cited AT&T's evidence (including Mr. Rhinehart's testimony) as to the deficiencies in Aureon's rates, further testimony by Mr. Rhinehart is undoubtedly a "necessary link" of evidence that the Commission would need to consider in deciding whether Aureon's February 2018 tariff filing satisfies the Act and Commission's rules.

"Aureon's counsel will necessarily rely upon the technical and accounting expertise of … four Aureon executives in order to analyze and construe information that AT&T may call highly confidential information in this proceeding."[4] Indeed, Aureon specifically asked the Commission to implement the Model Protective Order, which gives each participant's consultants access to confidential information, regardless of whether those experts are deemed "in-house" or "outside" consultants.[5] The Commission ultimately permitted Aureon's business executives to access AT&T's confidential and highly confidential information submitted in connection with AT&T's formal complaint.[6] In this proceeding (which is focused primarily on Aureon confidential information), it has reversed position and is seeking to deprive AT&T of the benefit of using the same consultant it used in the complaint proceeding to provide analysis that is virtually identical to the analysis that Mr. Rhinehart provide in the complaint proceeding and that the Commission relied on in concluding that "significant questions" had been raised regarding "Aureon's CEA practices and rates that deserve further exploration."[7] The Commission should reject Aureon's duplicitous and opportunistic request.

Second, Aureon does not deny that there is substantial overlap between the factual and legal issues in this investigation and in the complaint proceeding, nor does it adequately explain why confidential material similar to the "Confidential" and "Highly Confidential Material"

[4] Letter from James U. Troup and Tony S. Lee (Counsel for Aureon) to Christopher Killion (Commission), at 1 (dated Feb. 17, 2017) (attached hereto as Exhibit 1).

[5] *See id*. at 2-3; *In the Matter of Implementation of Section 402(b)(1)(A) of the Telecomms. Act of 1996*, 12 FCC Rcd. 2170, App'x B (Standard Protective Order), ¶¶ 6-7 (1997) ("*Tariff Streamlining Order*").

[6] Letter Ruling, *AT&T Corp. v. Iowa Network Servs., Inc., d/b/a Aureon Network Servs.*, Proceeding Number 17-56 (Feb, 24, 2017) ("*Complaint Proceeding Protective Order*"). The only "Highly Confidential" information that Aureon's senior business executives were not permitted to review was material previously produced in other proceedings, including material produced by third parties.

[7] *See* Memorandum Opinion and Order, *AT&T Corp. v. Iowa Network Servs., Inc., d/b/a Aureon Network Servs.*, Proceeding Number 17-56, ¶ 30 (Nov. 8, 2017) ("*Liability Order*").

submitted in the complaint proceeding must be treated differently. Instead, it argues that the Commission has requested information above and beyond the information it was required to produce in the complaint proceeding, including third-party information (such as historic traffic data) and information from its unregulated "Network Division." *See* Opp. at 3-5. What Aureon fails to mention is that this type of data *was* provided in the complaint proceeding. In response to AT&T's interrogatories, Aureon produced traffic data regarding other interexchange carrier ("IXCs").[8] Likewise, revenue and cost data regarding its other non-regulated services was produced and made a part of the record via Mr. Rhinehart's initial declaration.[9] Moreover, to the extent the Commission has requested data in this proceeding that is particularly sensitive in nature, the remedy for that problem is for Aureon to request a two-tier confidentiality structure, as AT&T suggested in its Motion to Amend.[10]

In its Opposition, Aureon does not even address this alternative, but argues for blanket protection of all "new" material (even though the "new" material is similar to what Aureon previously provided). That approach is simply not justified, particularly given: (a) the highly expedited nature of this proceeding, (b) Aureon's new agreement to permit Mr. Rhinehart and three other designated individuals at AT&T to use information from the complaint proceeding in this investigation,[11] and (c) the fact that AT&T and Aureon's other ratepayers should have the

[8] *See, e.g.*, Joint Statement on Settlement, Discovery and Scheduling, *AT&T Corp. v. Iowa Network Servs., Inc., d/b/a Aureon Network Servs.*, Proceeding Number 17-56, at 8 (July 20, 2017) (agreeing to provide "for each of the seventeen IXCs identified in Aureon's response, the total minutes of use by month and by carrier of all traffic that Aureon transported between September 2013 and May 2017"); Aureon Supplemental Response to AT&T Interrogatory No. 11 (providing historical traffic data for IXCs on Aureon's CEA network from 2013 – 2017) (Aureon_02762 – Aureon_02815) (dated Aug. 7, 2017).

[9] *See* Declaration of Daniel P. Rhinehart, ¶ 20, n.31 & Exs. 70, 71 and 72.

[10] Motion of AT&T Services, Inc. to Amend Protective Order and for Expedited Ruling, *Iowa Network Access Division Tariff F.C.C. No. 1,* WC Docket No. 18-60, at 10 n.24 (Apr. 23, 2018) ("Mot.").

[11] Opp. at 2 ("Aureon is willing, as an accommodation to AT&T, to relax the use restriction in the Protective Order governing the Complaint Proceeding to enable the four AT&T employees—and only those employees—who were permitted access to certain documents in that proceeding to use that information in this investigation."); *id*.at 13

right to examine the validity and reasonableness of Aureon's CEA rates using their own internal expertise. Aureon should not be permitted to hide its data behind claims of confidentiality that have no legitimate basis. To restrict Mr. Rhinehart and other internal consultants from accessing what are effectively "updates" to the same type of material Aureon provided in the complaint proceeding makes no sense and should not be countenanced. Instead, Mr. Rhinehart and other inside consultants who are not engaged in competitive decision-making should be permitted access to such material subject to the terms of the Protective Order.[12]

Third, it is *Aureon's* burden—not AT&T's—to justify any "additional degree of protection" it wishes to have afforded to its confidential information.[13] The Commission has repeatedly made clear that "tariff proceedings are historically open, and the supporting cost data historically has been available for public inspection."[14] The burden is thus upon *Aureon* to establish that heightened protection should be provided for material submitted in connection with this tariff proceeding.[15] Where no heightened protection is justified, the Commission has generally permitted in streamlined tariff proceedings the employees of a reviewing party (such as AT&T) to access confidential information, provided that such employees: (i) are "requested by counsel to furnish technical or other expert advice or service," (ii) are not "in a position to use this information for competitive commercial or business purposes" (*i.e.*, they are not involved in "Competitive Decision-Making"), (iii) are advised by counsel "of the terms and obligations of the [Protective

(same).

[12] To clarify, AT&T is not requesting that AT&T business executives other than Mr. Rhinehart (including the other three individuals designated under the *Complaint Proceeding Protective Order*) be given access to "Confidential" material under the *Protective Order*.

[13] *See In the Matter of Examination of Current Policy Concerning the Treatment of Confidential Info. Submitted to the Comm'n*, 13 FCC Rcd. 24816, ¶ 26 (1998) ("*Confidential Information Policy Statement*").

[14] *See Charter*, 30 FCC Rcd. 10360, ¶ 8.

[15] *Confidential Information Policy Statement*, 13 FCC Rcd. 24816, ¶ 40.

Order]," and (iv) execute the acknowledgment provided by the Protective Order.[16] To date, Aureon has not made any showing why deviation from this approach is justified or why the information it now seeks to shield is "especially sensitive."[17] Heightened protections are therefore unwarranted at this point.[18]

Fourth, Aureon's lengthy discussion of the "Competitive Decision-Making" standard is inapposite. In its Motion to Amend, AT&T requested that inside consultants such as Mr. Rhinehart be given access to confidential information, "provided that those individuals are [i] providing technical or expert advice and [ii] are not involved in 'Competitive Decision-Making.'"[19] In past proceedings, the Commission has been very hesitant to impose a blanket exclusion on in-house experts because "such limitations may unreasonably preclude a party from utilizing individuals, consistent with its needs and resources, who can provide the requisite expertise to examine the documents."[20] Here, there is no question that Mr. Rhinehart is an expert with technical expertise on which AT&T has relied and wishes to continue to rely. Further, in the complaint proceeding, Aureon itself embraced this precedent arguing that its four business executives (who are each involved in Competitive Decision-Making) should be given access to AT&T's confidential and

[16] *Tariff Streamlining Order*, 12 FCC Rcd. 2170, App'x B, ¶¶ 6-7; *see also Confidential Information Policy Statement*, 13 FCC Rcd. 24816, App'x C, ¶¶ 6-7.

[17] *Charter*, 30 FCC Rcd. 10360, ¶ 16 n.55.

[18] Aureon also suggests that AT&T's proposal is "ironic," given that AT&T and other carriers were afforded heightened protections in an unrelated 2015 proceeding. *See* Opp. at 12-13. But that criticism has no merit. AT&T is not arguing here that a carrier can *never* be afforded heightened protections for material it submits in connection with an agency proceeding. To the contrary, AT&T has suggested that a two-tier structure may be appropriate for select data in this very proceeding. *See* Mot. at 10 n.24. AT&T's argument is instead that Aureon has failed to justify the need for that protection in this case, given the circumstances of the *Complaint Proceeding Protective Order* and the fact that Mr. Rhinehart has already accessed these materials in connection with his review in the complaint proceeding.

[19] Mot. at 1, 8.

[20] *Confidential Information Policy Statement*, 13 FCC Rcd. 24816, ¶ 26.

highly confidential information because Aureon needed to "rely upon [their] technical and accounting expertise" to review data.[21]

Moreover, Aureon's suggestion that in-house experts will not be sufficiently deterred from violating the protective order is completely unwarranted. Not only are such experts subject to the same sanctions as counsel, but counsel has an affirmative obligation to advise these designated experts "of the terms and obligations of the [Protective Order]."[22] These experts are not submitting a bare "unsupported *ipse dixit*" regarding their lack of involvement in Competitive Decision-Making, as Aureon suggests. To the contrary, the *Protective Order* requires *every* individual, whether an attorney or consultant, to submit a sworn certification that they are "not involved in Competitive Decision-Making."[23] In sum, Aureon fails to justify its request for a blanket restriction on in-house consultants' ability to access confidential information, particularly given its position that its own business executives required access to AT&T's confidential and highly confidential information in the complaint proceeding.

Finally, Mr. Rhinehart's extensive involvement in regulatory proceedings over the past several decades supports, rather than undermines, AT&T's request. Indeed, Mr. Rhinehart's historical access to confidential information demonstrates that he can be given access to sensitive information under a protective order without incident. And Aureon's cherry-picked quotations from Mr. Rhinehart's involvement in earlier proceedings fail to demonstrate that Mr. Rhinehart is involved in Competitive Decision-Making. As is clear from the declarations that Mr. Rhinehart has submitted both in this proceeding and in the complaint proceeding, Mr. Rhinehart is not

[21] *See supra* note 4.

[22] *Tariff Streamlining Order*, 12 FCC Rcd. 2170, App'x B, ¶¶ 6-7; *Confidential Information Policy Statement*, 13 FCC Rcd. 24816, App'x C, ¶¶ 6-7 (same).

[23] *Protective Order*, Acknowledgment, ¶ 6 ("I certify that I am not involved in Competitive Decision-Making.").

currently involved in Competitive Decision-Making, particularly as it relates to the businesses and matters at issue in this proceeding.[24] In fact, Aureon asserted as much in its Answer to AT&T's Complaint, characterizing Mr. Rhinhart as nothing more than a "professional witness."[25]

For these reasons and the reasons set forth in AT&T's motion, the Commission should grant AT&T's motion to amend the protective order.

[24] Decl. of Daniel P. Rhinehart in Support of AT&T Petition to Reject or Suspend, ¶ 1 ("My current responsibilities include participating in regulatory dockets and litigation matters on behalf of various AT&T entities in the areas of cost analysis and universal services matters. I also direct the development of AT&T's pole attachment and conduit occupancy rates pursuant to standard FCC and state formulas, and I support the analysis of third-party pole attachment rates.").

[25] *See* Aureon Answer, Decl. of Jeff Schill, ¶ 4, *AT&T Corp. v. Iowa Network Services, Inc., d/b/a Aureon Network Services*, Proceeding Number 17-56 (June 28, 2017).

Respectfully submitted,

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Dated: May 2, 2018

Counsel for AT&T Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2018, I caused a copy of the foregoing Reply in Support of AT&T Services, Inc.'s Motion to Amend Protective Order to be served via email on the following:

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Exhibit 1

Letter from James U. Troup and Tony S. Lee (Counsel for Aureon) to FCC (dated Feb. 17, 2017)

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February 17, 2017

Via E-Mail

Christopher Killion
Lisa Griffin
A.J. DeLaurentis
MDRD, Enforcement Bureau
Federal Communications Commission
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Re: *Iowa Network Services, Inc. v. AT&T Corp.*, No. 14-cv-03439 (D. N.J.)

Dear Mr. Killion:

As discussed during the status call with FCC staff on February 10, 2017, Iowa Network Services, Inc. d/b/a Aureon Network Services and AT&T have made some progress in negotiating the terms of a proposed protective order. The compromises offered by Aureon were premised on four specifically identified Aureon executives being able to review highly confidential information produced in this proceeding. However, the parties are at an impasse because AT&T refuses to move from its position that highly confidential information cannot be reviewed by those employees. As previously explained in Aureon's January 18, 2017 letter, Aureon needs the four key executives to review highly confidential information because (1) Aureon cannot authorize its counsel to file pleadings and briefs with the Commission without fully reviewing and understanding the reasoning and data underlying the arguments being made, and as a small company, Aureon's executives perform multiple responsibilities, and it does not have in-house counsel to review the information that AT&T wants to restrict to attorneys' eyes only; and (2) Aureon's counsel will necessarily rely upon the technical and accounting expertise of these four Aureon executives in order to analyze and construe information that AT&T may call highly confidential information in this proceeding.

AT&T's gambit to preclude Aureon's executives from fully participating in the formal complaint proceeding is not supported by the FCC's rules or recent decisions in complaint proceedings before the FCC. Section 1.731 of the Commission's rules governs the confidentiality of information produced or exchanged in formal complaint proceedings.[1] Specifically, Section 1.731(b) provides, in relevant part:

[1] 47 C.F.R. § 1.731.

> (b) Except as provided in paragraph (c) of this section, materials marked as proprietary may be disclosed solely to the following persons, only for use in prosecuting or defending a party to the complaint action, and only to the extent necessary to assist in the prosecution or defense of the case:
>
> . . .
>
> (2) Officers or employees of the opposing party who are named by the opposing party as being directly involved in the prosecution or defense of the case . . . .

Section 1.731(b) presumes that highly confidential documents, including those containing proprietary information, can be disclosed to officers, such as those already identified by Aureon in this case, directly involved in defending a formal complaint. Should AT&T wish to restrict the access of Aureon executives to that information, AT&T can do so by making a proper showing under Section 0.459 on a case-by-case basis.[2] The presumption under the Commission's rules is for full disclosure of all confidential information to attorneys, officers and employees involved with the case, and consultants or experts retained by the parties.[3]

Consistent with this principal as codified in the Commission's rules, the FCC recently issued a protective order in a formal complaint proceeding involving AT&T. In *AT&T Services Inc. v. Great Lakes Commnet, Inc.*, pursuant to a request by AT&T and the other parties in that proceeding, the FCC issued a letter ruling on March 3, 2016 adopting a modified protective order "based largely upon the Model Protective Order approved by the Commission in *Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission*, Report and Order, 13 FCC Rcd 24816, Appendix C (1998)."[4] The modified protective order specifically allowed the parties and authorized representatives to have access to confidential information, and did not grant AT&T veto power over disclosure of information to the defendants' employees. Specifically, Section 7(b) of the modified protective order stated that persons authorized to review confidential information included "[s]pecified persons, including employees of the Review Parties, requested by counsel to furnish technical or other expert advice or service, or otherwise engaged to prepare material for the express purpose of formulating filings in this proceeding . . . ."

The use of a modified version of the Commission's Model Protective Order in *AT&T v. Great Lakes Commnet* obviated the need to draw in Commission staff to resolve repeated disputes over information that employees could review. Consistent with the FCC's rules and its March 3, 2016 letter in *AT&T v. Great Lakes Commnet* adopting a protective order based on the FCC's

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[2] 47 C.F.R. § 1.731(c).

[3] *See* 47 C.F.R. § 1.731(b)(1)-(5).

[4] *AT&T Services Inc. v. Great Lakes Commnet, Inc.*, Letter, EB Docket No. 14-222, File No. EB-14-MD-012, 2016 WL 880263 (rel. Mar. 3, 2016).

Model Protective Order, the FCC should adopt the FCC's standard protective order in the instant proceeding to permit Aureon's four executives to review all information, including highly confidential information, produced by AT&T. The terms of the standard protective order prohibit any person reviewing confidential information from using confidential information for any purpose other than for the complaint proceeding before the FCC. The Commission has full authority to appropriately sanction violations of a protective order. Moreover, AT&T's concern that Aureon may be able to use AT&T's confidential information to AT&T's competitive detriment is misplaced as Aureon and AT&T do not compete in the same space.

During the February 10th call, AT&T argued that the U.S. Court of Appeals decision in *CBS v. FCC*, 785 F.3d 699 (2015), precluded Aureon's proposal to allow Aureon employees access to AT&T's confidential information, and to provide a five (5) day period for AT&T to object to such disclosure. The *CBS* decision is wholly inapplicable to formal complaint proceedings as that case involved a proposed merger in which third parties requested access to confidential materials provided to the FCC by the merging parties. Section 1905 of The Trade Secrets Act[5] barred the FCC from disclosing the applicants' confidential information to third parties. Different regulations apply to formal complaint proceedings. In formal complaints, documents are not disclosed to the FCC or to third parties, but rather, directly to the proceeding participants. As such, Section 1.731 specifically contemplates the disclosure of confidential materials to a party's employees. Consistent with that rule, the FCC adopted an order allowing the disclosure of AT&T's confidential information to respondents in *AT&T v. Great Lakes Commnet.*

It is important to note that the modified protective order in *AT&T v. Great Lakes Commnet* is consistent with the Model Protective Order in Appendix C of *Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission*, 13 FCC Rcd 24816. In contrast, the Court of Appeals vacated the protective order in *CBS v. FCC* because it was a "substantive and important departure from prior Commission policy",[6] and the FCC "'must provide a reasoned analysis indicating that prior policies and standards are being deliberately changed, not casually ignored.'"[7] To avoid deviation from established Commission policies regarding protective orders in complaint proceedings, the FCC should adopt its standard protective agreement for this proceeding. The Commission's standard protective order naming the parties to this court referral is attached. In the alternative, should the FCC decide not to adopt a standard protective order for confidential information produced by the parties, Aureon also submits an alternative proposed protective order with this letter that permits AT&T to object on a case-by-case basis to the disclosure of confidential information.

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[5] 18 U.S.C. § 1905.

[6] *CBS v. FCC*, 785 F.3d at 709.

[7] *Id.* (quoting *Ramaprakash v. FAA*, 346 F.3d 1121, 1124 (D.C. Cir. 2003)).

Should you have any questions with respect to this matter, please contact the undersigned at (703) 812-0511.

Respectfully submitted,

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